

Affidavit of Michele Knotts

I am Senior Vice President – Land – Acquisitions & Divestitures for Zenergy, Inc. I am familiar with the business of Zenergy and the files it keeps. I have been employed by Zenergy since 2006.

I have reviewed Zenergy's records with respect to matters involved in the action styled Choctaw Nation of Oklahoma v. Enable Midstream Partners, L.P., et al., Case 21-cv-00190-Raw ("Litigation"). The Amended Complaint alleges at ¶ 13 that Zenergy owns at least one pipeline transgressing the Choctaw Nations trust land in Pittsburg County and that the right-of-way for that pipeline expired in 2011.

We have identified the document referenced in the Amended Complaint as a Grant of Easement for Right-of-Way dated August 8, 1991, which is filed as Doc. 29-1 in the Litigation. It expired by its terms in 2011. The Choctaw Nation, in Doc. 29-2, describes the Grant of Easement specifically so that we can determine it is the same one. That same document (29-2) shows 1991 plans for a well bore that would cross the corner of Section 31 (the Nation's trust land) prior to reaching its target in Section 30 with the drilling initiated from a pad location in Section 32.

I have reviewed documents maintained by the Oklahoma Corporation Commission. Those documents are filed as Docs. 29-3, 29-4, and 29-5. These public filings show the proposed well was a dry hole that was promptly plugged and abandoned. These forms include a form 1000 Application to Drill, Recomplete or Reenter approved by the Oklahoma Corporation Commission on June 26, 1991; a form 1002A completion report showing that the result was a dry hole and filed with the Commission on November 15, 1991; and a Form 1003 Plugging Record filed with the Commission on January 21, 1992, establishing the well bore was plugged and abandoned on October 16, 1991. Because the well was a dry hole, there would have been no pipeline installed pursuant to the 1991 Grant of Easement for Right-of-Way, which is filed as Doc. 29-1.

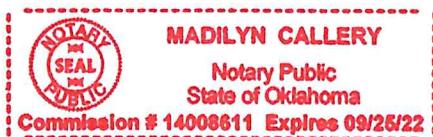
Michele Knotts
Senior Vice President – Land – Acquisitions &
Divestitures for Zenergy, Inc.

STATE OF OKLAHOMA)

) ss.

COUNTY OF TULSA)

Subscribed and sworn to before me this 12 day of August, 2021.



Notary Public
Commission Number 14008611

My Commission Expires:
September 25, 2022

EXHIBIT